

***Extract from the 1178th Licensing Meeting of the Agency was held on 14<sup>th</sup> January 2025, in EPA Headquarters, Johnstown Castle Estate, County Wexford***

The 1178<sup>th</sup> Licensing Meeting of the Agency was held on 14<sup>th</sup> January 2025, in EPA Headquarters, Johnstown Castle Estate, County Wexford.

Directors Present: L Burke (Chair);  
G O' Leary, M Lehane, E Cotter T Ryan & D Flynn

**3. Office of Environmental Sustainability  
Application for a Waste Licence Review Roadstone Limited Reg. No. W0277-04**

*Applicant:* **Roadstone Limited  
Huntstown Inert Waste Recovery Facility  
Huntstown Quarry  
Huntstown  
Kilshane and Johnstown Townlands  
Finglas  
Dublin 11**

*Register of Licence No:* **W0277-04**

The Directors considered recommendations from the Office of Environmental Sustainability that the Agency approve the Recommended Decision to grant a review of the Waste Licence. The following documentation was submitted:., Recommended Decision; a Report of the Inspector dated 12 December 2024 and a Memorandum dated 9 January 2025.

A copy of the licence application was available electronically.

Darragh Hearne, Anne Lucey and Warren Phelan gave verbal presentations.

**Inspector's Report**

The Directors noted the Inspector's Report and Memorandum.

**Recommended Decision**

The Directors noted the Recommended Decision and approved the recommendations with the following amendments.

**Conditions:**

**Condition 2. Management of the Facility**

**2.2.13.2 (f)** Amend the wording in condition 2.2.13.2 (f) to read as follows:  
'validation to confirm the absence of invasive species at the ~~restored~~ facility.'

*Reason for Decision:*

In the interest of providing clarity.

**Condition 3. Infrastructure and Operation**

**3.12.1 (a)** Amend the wording in Condition 3.12.1 (a) to read as follows:

‘silt traps, ~~or~~ **settlement ponds and** oil separators on all storm water discharges, other than from roofs,’

Reason for Decision:

In the interest of providing clarity.

**3.12.4** Amend the wording in Condition 3.12.4 to read as follows:

*‘The licensee must provide separate monitoring points on the run-off, arising from the waste backfill areas of the south quarry void within the licence boundary and from any other area of the south quarry void, prior to entry to the settlement ponds within the facility.’*

~~‘The licensee must provide separate monitoring points on the process water run-off, arising from the waste and by-product backfill areas of the south quarry void, prior to entry to the settlement ponds within the licence boundary, if required by the Agency.’~~

Reason for Decision:

In the interest of providing clarity.

**3.12.5** Amend the wording in Condition 3.12.5 to read as follows:

*‘Run-off, arising from the waste backfill area within the licence boundary and from any other area of the south quarry void, must be separately monitored for the parameters as listed in Schedule B.2: Emissions to Water, of this licence prior to entry to the settlement ponds.’*

~~Process water run-off, arising from the waste and by-product backfill areas of the south quarry void, must be monitored for the parameters as listed in Schedule B.2: Emissions to water, prior to entry to the settlement ponds, if required by the Agency~~

Reason for Decision:

In the interest of providing clarity.

**3.12.6** Insert a new Condition 3.12.6 to read as follows:

*‘Emission limit values, for emissions to waters from the settlement ponds at Emission Point DP34, apply to emissions from the settlement ponds treating run-off arising from either or both the waste backfill area within the licence boundary and from any other area of the south quarry void outside the facility.’*

Reason for Decision:

In the interest of providing clarity

**3.25** Amend the wording in Condition 3.25 to read as follows:

‘Waste ~~and by-product~~ inspection and quarantine areas’

Reason for Decision:

In the interest of providing clarity.

**3.25.1** Amend the wording in Condition 3.25.1 to read as follows:

‘A waste ~~and by-product~~ inspection area and a waste ~~and by-product~~ quarantine area must be provided and maintained at the facility.’

Reason for Decision:

In the interest of providing clarity.

**3.25.2** Amend the wording in Conditions 3.25.2 to read as follows:

‘These areas must be constructed and maintained in a manner suitable and be of an appropriate size for the inspection of waste ~~and by-product~~ and subsequent quarantine if required.’

Reason for Decision:

In the interest of providing clarity.

**3.25.3** Amend the wording in Condition 3.25.3 to read as follows:

‘The waste ~~and by-product~~ inspection area and the waste ~~and by-product~~ quarantine area must be clearly identified and segregated from each other.’

Reason for Decision:

In the interest of providing clarity.

**3.25.4** Delete Condition 3.25.4

~~‘Quarantined waste and by-product must be clearly identified and segregated from each other’~~

Reason for Decision:

In the interest of providing clarity.

All subsequent conditions in the Recommended Decision should be renumbered to reflect the conditions removed.

**3.25.5** Renumber Condition 3.25.5 to 3.25.4 Amend the wording to read as follows:

‘All waste ~~or by-product~~ deposited at the waste quarantine area **must** be stored **under cover**.’

Reason for Decision:

In the interest of providing clarity.

**3.27.2** Amend the wording in Condition 3.27.2 to read as follows:

‘All waste ~~and by-product~~ arriving at or leaving the facility must be weighed at the weighbridge on-site.’

Reason for Decision:

In the interest of providing clarity.

**3.27.3** Amend the wording in Condition 3.27.3 to read as follows:

‘The wheel cleaner must be used by all vehicles leaving *the* facility, as required, to ensure that no waste water, storm water, or waste is carried off-site.’

Reason for Decision:

In the interest of providing clarity.

**3.32.3** Amend the wording in Condition 3.32.3 to read as follows:  
***'The height of the separation berm must at no time exceed 6 meters above the waste and by-product on either side backfilled material.'***

Reason for Decision:

In the interest of providing clarity.

**3.32.4** Amend the wording in Condition 3.32.4 to read as follows:  
***'Waste and by-product at no time shall Backfilled material must not exceed the height of the berm.'***

Reason for Decision:

In the interest of providing clarity.

## **Condition 6. Control and Monitoring**

**6.8** Insert a new Condition 6.8 to read as follows:  
***'Backfill of south quarry void.'***

Reason for Decision:

In the interest of providing clarity.

All subsequent conditions in the Recommended Decision should be renumbered to reflect the conditions added.

**6.8.1** Insert a new Condition 6.8.1 to read as follows:  
***'The licensee must arrange for the completion, within 12 months of the date of grant of the licence, by an appropriately qualified consultant/ professional, an assessment to identify the risks associated with the separation and backfilling of the south quarry void with waste within the licence boundary and with non-waste backfill material outside the licence boundary. The assessment must consider the:'***

***(a) the impact to the infrastructure and operations of the facility,  
and***

***(b) any other matters that may be identified by the Agency.'***

Reason for Decision:

In the interest of providing clarity.

**6.8.2** Insert a new Condition 6.8.2 to read as follows:  
***'The licensee must implement the following:***  
***(a) any proposals or recommendations arising from the assessment,  
subject to the approval of the Agency, and***  
***(b) any other matters that may be directed by the Agency.'***

Reason for Decision:

In the interest of providing clarity.

## **6.12 Groundwater monitoring**

**6.12.2(a)** Renumber Condition 6.12.2(a) to 6.13.2(a) and amend the wording to read as follows:

*‘identify the risk of groundwater contamination arising from licensed and past activities and from the separation and backfill of the south quarry void,’*

*Reason for Decision:*

In the interest of providing clarity.

**6.12.3** Renumber Condition 6.12.3 to 6.13.3 and amend the wording to read as follows:

*‘A hydrogeological risk assessment prepared under Condition 6.123.2 of this licence must be submitted to the Agency.’*

*Reason for Decision:*

In the interest of providing clarity.

## **Condition 8. Material Handling**

**8.3** Delete Condition 8.3

~~**Waste Material and by-product must be kept separate at all times.**~~

*Reason for Decision:*

In the interest of providing clarity.

All subsequent conditions in the Recommended Decision should be renumbered to reflect the conditions removed.

**8.7.2** Renumber Condition 8.7.2 to 8.6.2 and amend the wording to read as follows:

*‘Non-compliant materials must be dealt with in accordance with Condition 8.165.67 of this licence.’*

*Reason for Decision:*

In the interest of providing clarity.

**8.8 Backfill** Renumber Condition 8.8 to 8.7

**8.7.1** Insert a new Condition 8.7.1 to read as follows:

*‘With the exception of unsuitable waste as per Condition 8.4615.67, all soil and stone that enters the facility must be retained on site and utilised for backfill within the licence boundary.’*

**8.7.2** Insert a new Condition 8.7.2 to read as follows:

*‘All soil and stone utilised for backfill within the licensed boundary shall be regarded as waste for the purposes of this licence and shall be subject to compliance with the conditions of this licence.’*

Reason for Decision:

To prevent or minimise impact on the environment.

All subsequent conditions in the Recommended Decision should be renumbered to reflect the conditions added.

**8.12** Amend the wording in Condition 8.12 to read as follows:

**~~‘Waste, other than waste taken directly to the backfilling area and to be used for backfill, and~~** material must be clearly labelled and appropriately segregated.’

Reason for Decision:

In the interest of providing clarity.

**8.15.1** Insert a new Condition 8.15.1 to read as follows:

*‘Waste acceptance and characterisation procedures must have regard to the Agency’s ‘Guidance on waste acceptance criteria at authorised soil recovery facilities’ (2020), as may be amended or replaced by the Agency.’*

Reason for Decision:

In the interest of providing clarity.

**8.17.8** Delete Condition 8.17.8

**~~The waste and materials storage plan must include in its scope and by-product stored in/or immediately adjacent to the licensee boundary~~**

Reason for Decision:

In the interest of providing clarity.

**Condition 10. Closure, Restoration and Aftercare Management**

**10.2.5(e)** Amend the wording in Condition 10.2.5(e) to read as follows:

*‘details of the long-term supervision, monitoring, control, maintenance and reporting requirements for the ~~restored~~ facility.; and’*

Reason for Decision:

In the interest of providing clarity.

**10.2.5(f)** Insert a new Condition 10.2.5(f) to read as follows:

*‘details of the costings for the plan’*

Reason for Decision:

In the interest of providing clarity.

**10.3** Insert a new Condition 10.3 to read as follows:

*‘The licensee must, prior to the date of the commencement of the Construction and Demolition waste recovery activity and to the satisfaction of the Agency, make financial provision to cover any liabilities associated with closure, restoration, and aftercare identified in Condition 10.2.1 of this licence.’*

Reason for Decision:

In the interest of providing clarity.

**10.4**

Insert a new Condition to read as follows:

*‘The amount of financial provision held will be reviewed and revised as necessary or as required by the Agency.’*

Reason for Decision:

In the interest of providing clarity.

**10.5**

Renumber Condition 10.3 to 10.5 to read as follows:

*‘The licensee must comply with the Agency’s ‘Guidance on Assessing and Costing Environmental Liabilities’ (2014) and the Agency’s ‘Guidance on Financial Provision for Environmental Liabilities’ (2015), as may be amended or replaced by the Agency, when implementing Conditions 10.2, 10.3 and 10.4 of this licence.’*

Reason for Decision:

In the interest of providing clarity.

**Condition 11. Notification, Records and Reports**

**11.8.1(j)**

Amend the wording in Condition 11.8.1(j) to read as follows:

**‘a log of all by-product soil and stone for backfill that enters the facility as part of the intake procedure.’**

Reason for Decision:

In the interest of providing clarity.

**Condition 12. Financial Charges and Provision**

**12.2.1**

Amend the wording in Condition 12.2.1 to read as follows:

*‘The licensee must arrange for the revision by an independent and appropriately qualified consultant, of a comprehensive and fully costed revised Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities from past and present activities.’*

**‘The Agency may amend this licence in accordance with section 42B of the Waste Management Act 1996 as amended to require, or not require as the case may be, the putting in place of a financial provision to address liabilities for CRAMP and/or Environmental Liabilities Risk Assessment (ELRA)’**

Reason for Decision:

In the interest of providing clarity.

**12.2.2**

Insert a new condition to read as follows:

*‘The ELRA must be reviewed as necessary to reflect any significant change on-site, and in any case every three years following initial approval by the Agency.’*

Reason for Decision:

In the interest of providing clarity.

**12.2.3** Insert a new condition to read as follows:

*‘A report on the revised ELRA, must be submitted to the Agency for approval prior to the date of the commencement of the Construction and Demolition waste recovery activity.’*

Reason for Decision:

In the interest of providing clarity.

**12.2.4** Insert a new condition to read as follows:

*‘The licensee must, prior to the commencement of the Construction and Demolition recovery waste activity and to the satisfaction of the Agency, make financial provision to cover any liabilities with respect to the ELRA in Condition 12.2.1 of this licence. The amount of financial provision held will be reviewed and revised as necessary.’*

Reason for Decision:

In the interest of providing clarity.

**12.2.5** Insert a new condition to read as follows:

*‘The licensee must comply with the Agency’s ‘Guidance on Assessing and Costing Environmental Liabilities’ (2014) and ‘Guidance on Financial Provision for Environmental Liabilities’ (2015), as may be amended or replaced by the Agency, when implementing Conditions 12.2.1 and 12.2.2 of this licence’*

Reason for Decision:

In the interest of providing clarity.

## **SCHEDULE A: Limitations**

### **A.3 Waste Acceptance Criteria for Backfill Waste**

**Table A.3-3 A.3-1: Waste Acceptance Criteria for Backfill Waste**

Amend Column 2 in the below table to reflect renumbered Conditions

Soil and Stone	Minimum Criteria
Greenfield soil and stone	Letter of suitability
Non-greenfield soil and stone	<ol style="list-style-type: none"><li>1. Less than 2% contamination with non-natural solid materials in accordance with the definition of ‘contaminated soil and stone’ in this licence, and;</li><li>2. Characterised in accordance with <b>Schedule A.4: Waste Characterisation for non-greenfield soil and stone</b> of this licence and compliant with concentration limits and/or trigger levels established under Condition <del>8.7.1</del> 8.6.1 of this licence.</li></ol>

Reason for Decision:



In the interest of providing clarity and to correct a typographical error.

#### ***A.4 Waste Characterisation for non-greenfield soil and stone***

Amend Note1 and Note 2 to reflect renumbered Conditions

<b>Amount/Source</b>	<b>Test Method</b> <small>Note 1 &amp; 2</small>	<b>Frequency</b>
<b>Where the material comprises greater than 2,000 tonnes from a single source</b>	<b>Basic characterisation</b>	<b>To be carried out off-site prior to agreeing acceptance of the waste at the facility.</b>
	<b>Compliance testing</b>	<b>Once every 2,000 tonnes.</b> <small>Note 3 &amp; 4</small>
	<b>On-site verification</b>	<b>Every load.</b>
<b>Where the material comprises less than 2,000 tonnes from a single source</b>	<b>Basic characterisation</b>	<b>To be carried out on-site prior to use of the material for backfill at a frequency of at least one sample on every 2,000 tonnes of waste from the collective of single sources each of which is less than 2,000 tonnes.</b> <small>Note 3 &amp; 4</small>
	<b>On-site verification</b>	<b>Every load.</b>

**Note 1:** Testing to be carried out in accordance with Condition ~~8.7.2~~ '8.6.4' of this licence.

**Note 2:** Maximum contaminant concentration levels and/or trigger levels to be developed in accordance with Condition ~~8.7.3~~ '8.6.1' and ~~8.7.4~~ of this licence.

**Note 3:** To be carried out on representative samples of waste upon delivery.

**Note 4:** Part of each sample must be retained at the facility for three years and be available for Inspection/analysis by the Agency.

#### ***Reason for Decision:***

In the interest of providing clarity.

Following discussion, the Directors decided to grant a review of the licence to Roadstone Limited, Huntstown Inert Waste Recovery Facility, Huntstown Quarry, Kilshane and Johnstown Townlands, Finglas, Dublin 11 Register of Licence No. W0277-04, subject to the conditions as set out in the licence.